

MACCE & CRESTI, P.C.

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Clinton, NJ 08809

(908) 713-9008

John C. Macce, Esq. (ID#045361990)

Attorneys for Defendant, Robert Junge

MARY BASILE LOGAN, Individually and on behalf
of those similarly situated, Pro Se

Plaintiff,

V.

MERRITT GARLAND, in his official capacity of
Attorney General, Department of Justice;

LLOYD AUSTIN, III in his official capacity as the
Secretary, Department of Defense;

WILLIAM J. BURNS, in his official capacity as the
Director, Central Intelligence Agency;

CHRISTOPHER A. WRAY, in his official capacity as
the Director of the Federal Bureau of Investigation;

DENIS RICHARD MCDONOUGH, in his official
capacity as Secretary of Veterans Affairs;

ALEJANDRO MAYORKAS, in his official capacity as
Secretary, U.S. Department of Homeland Security;

MARCIA L. FUDGE, in her official capacity as
Secretary U.S. Department of Housing and Urban
Development;

ROBERT CALIFF, in his capacity as Commissioner,
Food and Drug Administration;

WILLIAM J. CLINTON, in his official capacity as the
former President of the United States of America

HILLARY R. CLINTON, in her official capacity as
Former Secretary of State for the United States of
America;

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

Case Number: 3:24-CV-00040-ZNQ-TJB

Civil Action

**ANSWER TO PLAINTIFF'S FIRST
AMENDED COMPLAINT AND
AFFIRMATIVE DEFENSES**

THOMAS KEAN, SR. in his former capacity as Chairman 9/11 Commission;

ROBERT MUELLER, in his former capacity as Director of the Federal Bureau Investigation;

JAMES COMEY, in his former capacity as Director of the Federal Bureau of Investigation;

CHRISTOPHER J. CHRISTIE, in the capacity of the former Governor of New Jersey;

RICHARD "DICK" CHENEY, in his former capacity as Vice President of the United States;

ELIZABETH "LIZ" CHENEY, in her former capacity as Chair, January 6 Commission;

JOHN KERRY, in his official capacity as U.S. Special Presidential Envoy for Climate;

GEORGE W. BUSH, in his former capacity as President of the United States;

BARACK H. OBAMA, in his former capacity as President of the United States;

LORETTA LYNCH, in her former capacity as United States Attorney General;

JAMES BAKER, in his former capacity as White House Chief of Staff;

ERIC HOLDER, in his former capacity as United States Attorney General;

JOSEPH R. BIDEN, in his official capacity as President, in his former capacities as Vice President and Senator of these United States;

JOHN ASHCROFT, in his former official capacity as United States Attorney General

JAMIE GORELICK, in his official capacity, Homeland Security Advisory member;

NANCY PELOSI, in her official capacity as Congresswoman (CA);

PHIL MURPHY, in his official capacity as Governor of New Jersey and as former Chair of the National Governors Association (NGA);

TAHESHA WAY, in her former capacity as Secretary of State, as former President of the National Association of Secretaries of State, and her current capacity as Lieutenant Governor, New Jersey;

JUDITH PERSICHILLI, in her official capacity as then Commissioner of Health for the State of New Jersey;

SEJAL HATHI, in her official capacity as Deputy Commissioner for Public Health Services;

MATTHEW PLATKIN, in his official capacity as Attorney General of the State of New Jersey;

KATHY HOCHUL, in her official capacity as Governor of New York;

ANDREW CUOMO, in his former capacity as Governor of New York and his capacity as Vice-Chair of the National Governors Association;

LETITIA JAMES, in her official capacity as Attorney General of the State of New York;

DEMOCRATIC NATIONAL COMMITTEE

REPUBLICAN NATIONAL COMMITTEE;

JAMES PITTINGER, in his official capacity as Mayor of Lebanon Borough, State of New Jersey;

LISA SELLA, in her official capacity as Deputy Clerk, Lebanon Borough, State of New Jersey;

ROBERT JUNGE, in his official capacity as Municipal Chair, Republican Party, Lebanon Borough, State of New Jersey

JOHN DOES (1-100)

JANE DOES (1-100)

Defendants.

The Defendant Robert Junge (hereinafter also referred to as the "Answering Defendant"),
by way of Answer to the Plaintiff's First Amended Complaint says:

INTRODUCTION

The information contained in the Introduction make general and sweeping statements none of which set forth any allegations attributable to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

SUMMARY OF ARGUMENT

1. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.
2. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.
3. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.
4. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.

5. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.

PARTIES

6. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.
7. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.
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12. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.
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53. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.

54. The Answering Defendant is without sufficient knowledge as to the truth or falsity of the allegations contained in this Paragraph of Plaintiff's First Amended Complaint and therefore leaves Plaintiff to her proofs.

55. Denied.

JURISDICTION AND VENUE

56. Denied.

57. Denied.

58. Denied.

59. Denied.

60. Denied.

COUNT ONE

EPIDEMIC OF DISINFORMATION

61. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

62. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

63. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
64. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
65. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
66. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
67. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
68. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
69. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

70. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
71. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
72. The Paragraph only states "PREVEZON" and is thus not amenable to either admit or deny.
73. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
74. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT TWO

BANKING

75. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT THREE

TRAFFICKING

76. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
77. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
78. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
79. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
80. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

HAITI

81. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
82. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
83. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
84. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
85. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
86. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
87. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

88. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
89. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
90. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
91. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT 4

OCCIDENTAL PETROLEUM AND GLENCORE CLARENDON, LTD.

90. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.¹
91. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information

¹ There appears to have been an error in the numbering of the Paragraphs. Count Three ended at Paragraph 91 and Count Four began with Paragraph 90.

contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

92. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

93. The allegations contained in this Paragraph and subparts of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

94. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

95. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

96. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT 5

SEPTEMBER 11, 2001

97. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

98. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
99. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
100. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
101. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
102. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
103. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
104. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
105. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

106. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
107. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
108. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
- 109.. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
110. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
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COUNT 6

I. ADENOVIRUS AND RELATED PRE-EXISTING FACTS.

121. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
122. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
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WANAQUE, HASKELL, NEW JERSEY (2018)

126. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
127. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

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145. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

146. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

VOTER CAGING

147. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

148. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

149. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

150. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

151. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
152. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
153. Denied.
154. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
155. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
156. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
157. Denied.
158. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
159. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

160. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
161. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
162. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
163. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
164. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
165. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT²

BARACK HUSSEIN OBAMA

² This Count was not numbered.

166. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

167. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

168. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT³

GEORGE W. BUSH

169. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

170. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

171. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

³ This Count was not numbered.

172. The allegations contained in this Paragraph of Plaintiff's First Amended Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

COUNT⁴

WILLIAM J. CLINTON

173. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

HARMS⁵

169. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.⁶
170. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
171. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.
172. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

⁴ This Count was not numbered.

⁵ There appears to have been an error in numbering of the Paragraphs.

⁶ There appears to have been an error in the numbering of the Paragraphs. "William J. Clinton" the preceding "Count" was numbered 173. The subsequent Paragraph with a heading "Harms" begins with numbered Paragraph 169.

173. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

174. The allegations contained in this Paragraph of Plaintiff's Complaint are not directed to the Answering Defendant. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

REMEDY

175. This Paragraph sets forth relief being sought by the Plaintiff. It cannot be either admitted or denied. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

176. This Paragraph sets forth relief being sought by the Plaintiff. It cannot be either admitted or denied. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

177. This Paragraph sets forth relief being sought by the Plaintiff. It cannot be either admitted or denied. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

178. This Paragraph sets forth relief being sought by the Plaintiff. It cannot be either admitted or denied. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

179. This Paragraph sets forth relief being sought by the Plaintiff. It cannot be either admitted or denied. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

180. This Paragraph sets forth relief being sought by the Plaintiff. It cannot be either admitted or denied. To the extent the information contained can be interpreted as allegations against the Answering Defendant same are hereby denied.

AFFIRMATIVE DEFENSES

1. The Complaint fails to state a claim upon which relief can be granted.
2. The Complaint is barred in whole or in part by the equitable doctrines of estoppel, laches, waiver and unclean hands.
3. The Court lacks subject matter jurisdiction.
4. The Complaint is barred by the Statute of Limitations.
5. The Answering Defendant reserves the right to dismiss Plaintiff's Complaint as venue in this court is improper.
6. The claims are barred in whole or in part by the failure of Plaintiff to mitigate damages.
7. Plaintiff's Complaint has been filed in violation of Rule 11 of the Federal Rules of Civil Procedure and the Answering Defendant requests that the appropriate sanctions and attorney's fees be assessed against Plaintiff for filing same.

WHEREFORE, the Defendant Robert Junge respectfully requests that the Complaint be dismissed in all respects, together with an award of costs, disbursements and attorneys' fees in State Farm's favor and for such other, further and different relief as the Court may determine to be just and proper.

JURY DEMAND

A trial by jury is hereby demanded on all issues.

DESIGNATION OF TRIAL COUNSEL

Pursuant to the Rules of Court, John C. Macce, Esq., is hereby designated as trial counsel.

MACCE & CRESTI, P.C.
Attorneys for the Defendant, Robert Junge



BY: JOHN C. MACCE, ESQ.

Dated: April 4, 2024

MACCE & CRESTI, P.C.

17 East Main Street

Clinton, NJ 08809

(908) 713-9008

John C. Macce, Esq. (ID#045361990)

Attorneys for Defendant, Robert Junge

MARY BASILE LOGAN, Individually and on
behalf of those similarly situated, Pro Se

Plaintiff,

V.

MERRITT GARLAND, in his official capacity of
Attorney General, Department of Justice; et. al.

Defendants.

**UNITED DISTRICT COURT
DISTRICT OF NEW JERSEY**

**Case Number: 3:24-CV-00040-
ZNQ-TJB**

Civil Action

CERTIFICATE OF SERVICE

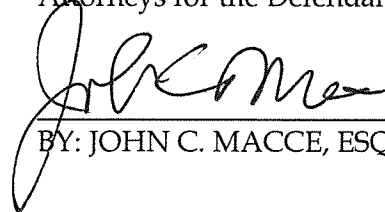
I hereby certify that on April 4, 2024 I electronically filed the following pleadings on
behalf of the Defendant Robert Junge:

1. Answer to Plaintiff's amended Complaint..

Notice of this filing will be sent via email to all counsel of record by the Court's
electronic filing system. All parties may access this filing through the CM/ECF system.

MACCE & CRESTI, P.C.

Attorneys for the Defendant, Robert Junge



BY: JOHN C. MACCE, ESQ.

Dated: April 4, 2024